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ENVIRONMENTAL MANAGEMENT DEPARTMENT
This is a RED Stamp

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ADMIN RECORD

REVIEWED FOR CLASSIFICATION/UCNI
By
Date 11/21/91

A-SW-000173

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Category 1	**Organization:**	**Environmental Management**

This is a CONTROLLED DOCUMENT
EG&G — ROCKY FLATS PLANT
ENVIRONMENTAL MANAGEMENT DEPARTMENT

TITLE: CONTROL OF QAA DEVELOPMENT

This is a RED Stamp

Approved By:

Director, Environmental Management — Date 9/23/91

1.0 PURPOSE

The following procedure describes required contents of a Quality Assurance Addenda (QAA) and the relationship of the QAA to other higher level programmatic Quality Assurance documents.

2.0 SCOPE

This procedure applies to the preparation of QAAs for all Work Plans (WP), and to other work at the discretion of the Responsible Division Manager. The procedure describes the method for planning and controlling deviations from the QAPD or QAPjP.

3.0 TERMS/DEFINITIONS

3.1 Quality Assurance Addenda (QAA) - A Quality Assurance Addenda is a functional document which serves to supplement the QA Project Plan for CERCLA Remedial Investigation/Feasibility Studies (RI/FS) and RCRA Facility Investigation/Corrective Measure Study (RFI/CMS) activities and other EMD activities. It provides the project specific requirements and elaborates on the particular activities to which the QAPD and/or QAPjP applies. The organizations that will be performing the work are identified as well as the applicable EM Department Standard operating procedures. Any deviations from the QAPD and/or QAPjP are also discussed along with a justification for the deviation. Project specific data quality objectives identified in the WP are summarized in the Quality Assurance Addenda. The Quality Assurance Addenda for remediation programs is prepared by the Remediation Programs Division of the EM Department or preparation may be delegated to a subcontractor. Responsible managers may also prepare QAAs for their activities, as needed.

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developing QAAs and for reviewing QAAs to ensure that applicable quality assurance/quality control requirements have been addressed. The QAPM shall concur on all QAAs.

4.3 Division Quality Coordinator: The Division Quality Coordinator is responsible for supporting the development of Quality Assurance Addenda and reviewing them to verify that they address the requirements contained in this procedure. The Division Quality Coordinator shall concur on QAAs.

4.4 Project Manager: The Project Manager is the EG&G EM Department staff member responsible for overseeing the preparation and implementation of the individual WP and the accompanying QAA. The Project Manager has the responsibility for reviewing the QAA for compliance with the content of the work plan. The Project Manager shall concur on all the QAA s developed for the WP for which they are responsible.

4.5 QAA Author: The QAA author is responsible for preparing the QAA in accordance with the format and content requirements contained in this procedure and submitting the QAA for appropriate review and approval.

5.0 PROCEDURE

5.1 Planned deviations, including omissions and additions, to the controls specified in the QAPD and/or QAPjP shall be documented, reviewed, approved, and issued as QAAs for specific projects, such as OU WPs.

5.2 A QAA shall be prepared for <u>each</u> WP generated for RI/FS and RFI/CMS activities related to the Interagency Agreement between the U.S. DOE, EPA, and CDH. QAAs may be prepared for other, non-IAG activities as necessary. QAAs shall be developed, reviewed, and approved in accordance with this procedure prior to work progressing past the planning stage. QAAs shall also be prepared for other EMD activities, where the responsible manager determines they are necessary.

NOTE
The QAA development is typically initiated once the final technical draft of the WP has been developed.

5.5 Organization and Content

The QAA shall be broken down into the same 19 sections as the QAPjP, preceded by an introduction and scope statement. These sections are:

Introduction and Scope Statement
1. Organization and Responsibilities
2. Quality Assurance Program
3. Design Control and Control of Scientific Investigations
4. Procurement Document Control
5. Instructions, Procedures, and Drawings
6. Document Control
7. Control of Purchased Items and Services
8. Identification and Control of Items, Samples, and Data
9. Control of Process
10. Inspection
11. Test Control
12. Control of Measuring and Test Equipment
13. Handling, Storage, and Shipping
14. Status of Inspection, Test and Operations
15. Control of Nonconformances
16. Corrective Actions
17. Quality Assurance Records
18. Quality Verification
19. Software

Appendix A - Analytical Methods, Detection Limits, and Data Quality Objectives

Redundant inclusion of text already specified in the QAPD and/or QAPjP is prohibited in the QAA unless it is identified below. Justification shall accompany each deviation from the QAPD and/or QAPjP. If no information is needed in a section then indicate "No Change to QAPjP" or similar wording. If this QAA is not related to the QAPjP then reference the QAPD rather than the QAPjP.

5.5.1 Introduction and Scope Statement

5.5.5.1 The QAA shall accompany the WP so the introduction and scope may be very brief.

5.5.3.2 Analytical Procedures - In this subsection of the QAA the appropriate analytical protocols shall be referenced, as applicable to the task. The protocols should be discussed in Section 3 and listed in Appendix A (see Attachment 4). If the analytical methods are already addressed in the WP, they may be incorporated in the QAA by reference.

5.5.3.3 Sampling Procedures

Sampling procedures, sample identification, and chain-of-custody requirements shall be identified here by referencing the appropriate operating procedures. The procedures should be presented in Section 3 in a matrix format (see Attachment 5). Frequencies for QC samples/checks shall be included in the QAA. A typical sample frequency/QC table is illustrated in Attachment 6 from Section 3. Appropriate sample handling requirements should also be included or a reference to the applicable section of the QAPjP specified. Handling requirements would be discussed in Section 8 and typically address holding times, preservation methods, containers, and possibly sample size (see Attachment 7).

5.6 Review and Approval of QAAs

5.6.1 Review the QAA per 3-21000-ADM-05.05, "Document Review" at the direction of the Responsible Division Manager.

5.6.2 Reviewers shall include the Responsible Division Manager, NEPA Manager, Responsible Project Manager, Responsible Division Quality Coordinator, QAPM, and other affected organizations as specified by the Responsible Division Manager.

6.2 Final Environmental Restoration Inter-Agency Agreement, August 17, 1990.

6.3 3-21000-ADM-05.05, Document Review.

6.4 3-21000-ADM-06.01, Document Control.

6.5 3-21000-ADM-17.01, Quality Assurance Records.

7.0 ATTACHMENTS

Attachment 1 - QAA Page Header

Attachment 2 - QAA Title Page

Attachment 3 - Example Organization Chart

Attachment 4 - Example Analytical Methods and DQO's

Attachment 5 - Example Procedure Matrix Format

Attachment 6 - Example QC Sample Collection/Check Frequency

Attachment 7 - Example Format for Sample Containers, Sample Preservation, and Holding Times

ATTACHMENT 2

QAA TITLE PAGE

QUALITY ASSURANCE ADDENDUM

QAA 1.1
Revision 0

to the

ROCKY FLATS SITE-WIDE QA PROJECT PLAN

FOR CERCLA RI/FS AND RCRA RFI/CMS ACTIVITIES

for

OPERABLE UNIT NO. 1, 881 HILLSIDE AREA

PHASE III RFI/RI

U S DEPARTMENT OF ENERGY
Rocky Flats Plant
Golden, Colorado

Revision 0

FEBRUARY, 1991

SAMPLE
REVIEWED FOR CLASSIFICATION/UCNI
By Barry H. Lostrom
Date 5/6/91 UNU

ANALYTICAL METHODS, DETECTION LIMITS, AND DATA QUALITY OBJECTIVES

Analyte	Method	SW	GW	BOREHOLE	SED	Required Detection Limits Water	Required Detection Limits Soil/Sed	Precision Objective	Accuracy Objective
INDICATORS									
Total Suspended Solids	EPA 160 2[d]	X[c]				10 mg/L	NA	20%RPD	80 120% LCS Recovery
Total Dissolved Solids	EPA 160 1[d]	X[c]	X[c]			5 mg/L	NA	20%RPD[c]	80 120% LCS Recovery
pH	EPA 150 1[d]	X[c]	X[c]			0 1 pH units	0 1 pH units	NA	±0 05 pH units
INORGANICS									
Target Analyte List Metals		X	X[c]	X	X			WATER/SOIL	WATER/SOIL
Aluminum	EPA CLP SOW[c]					200 ug/L[d]	40 mg/Kg[d]	**	***
Antimony	EPA CLP SOW[c]					60	12		
Arsenic (GFAA)	EPA CLP SOW[c]					10	2		
Barium	EPA CLP SOW[c]					200	40		
Beryllium	EPA CLP SOW[c]					5	1 0		
Cadmium	EPA CLP SOW[c]					5	1 0		
Calcium	EPA CLP SOW[c]					5000	2000		
Chromium	EPA CLP SOW[c]					10	2 0		
Cobalt	EPA CLP SOW[c]					50	10		
Copper	EPA CLP SOW[c]					25	5 0		
Cyanide	EPA 335 3 (modified for CLP)[c,d]					5	10		
Iron	EPA CLP SOW[c]					100 ug/L[d]	20 mg/Kg[d]	**	***
Lead (GFAA)	EPA CLP SOW[c]					3	1 0		
Magnesium	EPA CLP SOW[c]					5000	2000		
Manganese	EPA CLP SOW[c]					15	3 0		
Mercury (CVAA)	EPA CLP SOW[c]					0 2	0 2		
Nickel	EPA CLP SOW[c]					40	8 0		
Potassium	EPA CLP S					5000	2000		
Selenium (GFAA)	EPA CLP					5	1 0		
Silver	EPA r					10	2 0		
Sodium	EP/					5000	2000		
Thallium (GFAA)	E.					10	2 0		
Vanadium	EPA					50	10		

SAMPLE

ATTACHMENT 4
EXAMPLE ANALYTICAL METHODS AND DQO'S

CONTROL OF QAA DEVELOPMENT

EG&G ROCKY FLATS PLANT Manual: 3-21000-ADM
EMD ADMINISTRATIVE Procedure No.: 03.04, Rev. 0
PROCEDURE MANUAL Page: 13 of 16
Effective Date: 9/23/91
Category 1 Organization: Environmental Management

ATTACHMENT 6
EXAMPLE QC SAMPLE COLLECTION/CHECK FREQUENCY

TABLE 2

FIELD QC SAMPLE COLLECTION FREQUENCY

Activity	Frequency
Field Duplicate	1 in 20[1]
Field Preservation Blanks[2]	1 sample per shipping container (or a minimum of 1 per 20 samples)
Trip Blank[3]	1 in 20
Equipment Rinsate Blank	1 in 20[4], or 1 per day
Drilling and Decontamination Fluids	Sample source and analyze for all analytes of interest prior to use
Triplicate Samples (benthic samples)	For each sampling site

SAMPLE

1 Or per sampling event, whichever is more frequent.

2 For groundwater samples to be analyzed for inorganics.

3 For groundwater samples to be analyzed for volatile organics only

4 One equipment rinsate blank in twenty samples, or one per day whichever is more frequent for each specific sample matrix being collected when non-dedicated equipment is being used

PREPARATION OF DOCUMENT CHANGE NOTICE

EG&G ROCKY FLATS PLANT	**Manual:**	**3-21000-ADM**
EMD ADMINISTRATIVE	**Procedure No.:**	**05.07, Rev 1**
PROCEDURES MANUAL	**Page:**	**1 of 9**
	Effective Date:	**9/23/91**
Category 1	**Organization:**	**Environmental Management**

TITLE:
PREPARATION OF DOCUMENT
CHANGE NOTICE

Approved By:

Director, Environmental Management — 9/23/91 Date

1.0 PURPOSE

This procedure describes the process for issuance of urgent or temporary changes to EMD **procedures, Workplans (WPs), and Quality Assurance Amendments (QAAs) and other work instruction documents.**

2.0 SCOPE

This procedure must be invoked when the Responsible Manager determines a procedure must be changed immediately. This procedure specifies the required steps for developing and issuing DCNs for all EMD procedures, WPs, QAAs, and other instruction documents within the Environmental Management Department (EMD). This procedure may be initiated by any EMD or subcontractor personnel. Forms specified in this procedure maybe superseded by upper level procedures for some procedures or documents.

3.0 TERMS/DEFINITIONS

3.1 **DCC** - The Document Control Coordinator (DCC) is responsible for management of records addressed in 3-21000-ADM-06.01, Records Management.

3.2 **E&WM** - Environmental and Waste Management Operation

3.3 **EMD** - Environmental Management Department

3.4 **PA** - Performance Assurance Operation

3.5 **DCN** - A form for making a temporary or urgent change to a work instruction document (See Attachment 1 and 2).

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By
Date

1. Record the procedure name, number, revision, effective date, the current date, and the page number on the DCN forms.

2. Document DCN revision type and expiration date.

   a. If this is a temporary change, the date the change expires is recorded on the form. The date shall be within 90 days of the issuance date and must be recorded on the "Expires" line. Periods greater than 90 days for temporary procedures require authorization of the QAPM. Typically this extend period applies to limited scope DCNs.

      Check the block indicating that a procedure revision is not required.

   b. If this is not a temporary change, record the date 90 days from the current date on the "Expires Line."

      Check the block indicating that a procedure revision is required.

5.1.3 Arrange for review of the DCN by the Responsible Manager, the QAPM, and any others designated by the Responsible Manager.

NOTE

This review may be in writing, by verbal communication, or other expeditious means.

5.1.4 Comment disputes may be resolved by the Responsible Manager.

5.1.5 Obtain concurrence with this DCN from individuals specified by the Responsible Manager, and have them document their concurrence by initialing as "Others" on the DCN. This may be done verbally, if required, and documented as such.

5.1.6 Obtain concurrence of QAPM or designee with this DCN, by having the QAPM or designee initial and date the DCN. This may be done verbally, if required, and documented. If done verbally, identify individual who provided the QAPM concurrence, specify concurrence was verbal, then sign and date in the concurrence block.

5.1.7 Obtain the Responsible Manager's approval of this DCN by having the Responsible Manager or designee sign and date the DCN.

5.2.2 The required reviewers for this DCN include the responsible manager, QAPM, and other effected organizations.

6.0 REFERENCES

6.1 E&WM Administrative Procedures Manual, Procedures 2-20000-ADM-05.01 and 2-20000-ADM-05.02

6.2 EMD Administrative Procedures Manual, 3-21000-ADM-06.01, Document Control procedure

6.3 EMD Administrative Procedures Manual, 3-21000-ADM-17.01, Records Management procedure

6.4 EMD Administrative Procedures Manual, 3-21000-ADM-05.06, QAPM Management Procedure Review Process

6.5 EMD Administrative Procedures Manual,3-21000-ADM-05.03, RFI/RI Work Plan Development

6.6 EMD Administrative Procedures Manual,3-21000-ADM-05.09, EMD Work Plan Development

7.0 ATTACHMENTS

1. Document Change Notice (DCN)

2. EM Document Change Notice Continuation Sheet

ATTACHMENT 2
EM Document Change Notice Continuation Sheet

DOCUMENT CHANGE NOTICE (DCN)
(Continuation Sheet)

Page ___ of ___
DCN no _____

Procedure no	Title
Scope Limitation. _____	

Item Number	Page	Step or Paragraph	Changes (Use DCN CONTINUATION SHEET for additional space)

Justification (Reason for change - Provide numbers to reference corresponding items above)

EG&G ROCKY FLATS PLANT	Manual Number:	3-21000-ADM
EMD ADMINISTRATIVE	Procedure No.	05.08, Rev 0
	Page:	1 of 4
	Effective Date:	9/23/91
CATEGORY 1	Organization:	ENVIRONMENTAL MANAGEMENT

Title: FORMS CONTROL

Approved By: _____ Director, Environmental Management

9/23/91 Date

1.0 PURPOSE

The purpose of this procedure is to facilitate approval and distribution of Environmental Management Department (EMD) procedure forms.

2.0 SCOPE

This procedure applies to all EMD procedure forms.

3.0 DEFINITIONS

3.1 Mark Up

Mark up is the draft form with hand-written changes as necessary to produce a document consistent with the review and approval process.

4.0 RESPONSIBILITIES

4.1 Quality Assurance Program Manager (QAPM) reviews and approves forms; then assures that these forms are distributed to all users of EMD procedures.

4.2 Quality Assurance Coordinator (QAC) submits forms for revision per the direction of the responsible manager and resolves comments on forms with the QAPM.

4.3 Responsible Manager arranges for revision of forms required to implement the procedures for which the manager is responsible. Addresses changes in forms requested by users. Directs the QAC to submit revised forms to the QAPM for review and approval.

4.4 EMD Personnel use current forms for all EMD activities. Also, EMD personnel are responsible for submitting new or revised forms for review, approval, and controlled distribution. EMD personnel submit the new or revised forms to the QAPM through the Responsible Manager.

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By
Date 9/24/91

5.4.7 The approved forms are then distributed, along with the applicable updated index, to all affected personnel, in accordance with 3-21000-ADM-06.01, Document Control.

5.5 All completed forms and the concurrence form with the attached mark up are quality assurance records subject to 3-21000-ADM-17.01, Records Management.

6.0 REFERENCES

6.1 EMD Procedure 3-21000-ADM-06.01, Document Control.

6.2 EMD Procedure 3-21000-ADM-17.01, Records Management.

6.3 EMD Procedure 3-21000-ADM-18.01, Surveillance.

7.0 ATTACHMENTS

Attachment 1 -- Controlled Document Concurrence Form

EG&G ROCKY FLATS PLANT	**Manual:**	**3-21000-ADM**
EM ADMINISTRATIVE	**Procedure No.:**	**15.01, Rev. 0**
PROCEDURE MANUAL	**Page:**	**1 of 18**
	Effective Date:	**9/23/91**
Category 1	**Organization: Environmental Management**	

Approved By:

TITLE:
CONTROL OF NONCONFORMING ITEMS AND ACTIVITIES

Director
Environmental Management 9/23/91

1.0 PURPOSE

To provide the methods and controls necessary for the reporting, documentation, evaluation, and disposition of items found to not be in conformance with specifications, requirements, prevailing practices, procedures, and standards. These measures are necessary to prevent the inadvertent installation or use of items that are questionable or unusable for Environmental Management (EM) Program activities.

2.0 SCOPE

This procedure applies to all nonconforming items associated with activities performed by EM Department and contractor/supplier personnel in support of EM activities.

3.0 TERMS/DEFINITIONS

3.1 Activity - An aspect of work, service, operation, condition, or process which impacts quality, safety, or the environment.

3.2 Amended Response - A change to the disposition that is intended to replace the original disposition or any portion thereof.

3.3 Conditional Release - An interim disposition that authorizes a process or activity to continue even though a nonconforming condition has been identified.

3.4 Disposition - The action taken to resolve a nonconforming condition or item and to restore acceptable conditions.

3.5 Items - Equipment, supplies, or data which impacts quality, safety, or the environment.

3.6 NCR - Nonconformance Report

REVIEWED FOR CLASSIFICATION
By
Date 9/24/91

4.1 The EM Department Director, or delegate, is responsible for coordinating with the EM Quality Assurance Program Manager (QAPM) to assure Nonconformance Reports (NCRs) are properly reviewed and resolved.

4.2 The EM QAPM, or delegate, is responsible for:

1. Coordinating and processing NCRs including tracking and monitoring NCRs, coordinating the use of status tags and conditional releases, assigning disposition responsibilities, evaluating the proposed dispositions for all NCRs, preparing NCR files, and verifying disposition implementation.

2. Designates the EM Department NCR Validator.

3. Designates the EM Department NCR Coordinator.

4.3 EM Department and Contractor/Supplier Personnel are responsible for:

1. Initiating NCRs in accordance with this procedure.

2. Providing dispositions.

3. Implementing dispositions that are authorized by approved procedures and have been assigned by the EM QAPM.

4.4 The EM NCR Coordinator is responsible for:

1. Maintaining an NCR data base and filing system for in-process original NCRs.

2. Assigning a unique NCR tracking number to each validated NCR.

3. Providing issuance of validated NCRs and distribution of copies to the affected organizations.

4. Coordinating and tracking the processing of NCRs.

5. Issuing the dispositioned NCR to the organization responsible for implementing the disposition.

5.2.2.1 If the NCR is determined to be invalid, the Validator will contact the initiator to discuss the reasons. Following discussion, if the NCR is still determined to be invalid, it shall be returned to the initiator and no further action is taken. A copy of the invalidated NCR shall be retained in the NCR master file and transmitted to EMD record center per 3-21000-ADM-17.01, Records Management.

5.2.2.2 If the NCR is found to be valid, it shall be forwarded to the EM NCR Coordinator for number assignment, logging, and transmittal to the affected organizations responsible for disposition of the nonconformance and a copy will be forwarded to EMD record Center.

5.2.2.3 Valid NCRs shall be entered in the Nonconformance Report Log (Attachment 3) by the QA NCR Coordinator. The NCR number shall take the form of EM NCR-XX-YY, where XX is the current fiscal year and YY is a sequential number starting with 01. All columns of the log shall be filled out for validated NCRs.

5.2.2.4 Following validation, the EM QAPM directs the appropriate EM Department Quality Coordinator to apply NCR Status Tags (Attachment 4).

5.3 Identification and Segregation of Nonconforming Items:

Nonconforming items shall be uniquely identified and/or segregated in accordance with the following provisions, unless exempted by the EM QAPM or delegate. The marking or segregation shall not adversely affect the end use of the item.

note the exemption with an explanation on the NCR.

5.4 Conditional Release

A Conditional Release, if requested by the responsible manager, shall be approved by the EM QAPM to allow continuation of an activity or work after consideration of the following conditions, and with justification documented in a conditional release report.

5.4.1 The following conditions will be considered for the proposed conditional release and a justification or explanation shall be documented in a memo from the QAPM authorizing Conditional Release Request:

1. The nonconforming item can be removed or corrected at a later date without change, damage, or contamination of the associated data, item, condition, equipment, structures, service, material, or activity.

2. The nonconforming item remains accessible for examination.

3. The nonconforming item is evaluated, and limitation(s) for use of the equipment or system is established.

4. Traceability and identification of the nonconforming item are maintained.

5.4.2 The Conditional Release Request memo from the responsible manager will be referenced in or included with the NCR.

5.5 Disposition of NCRs

The EM QAPM shall coordinate with the EM Division Managers to assign personnel to provide a proposed disposition for the NCR within 30 calendar days. This assignment shall be recorded on the NCR, and the NCR shall be forwarded to the assigned personnel for disposition. These personnel shall have access to pertinent background information.

9. If a conditional release has been requested, the justification has been documented and properly approved.

10. Internal interfaces between organizational units and external interfaces between Project participants necessary for executing actions are described.

5.5.2 The NCR shall be forwarded (by the QA NCR Coordinator) to the cognizant personnel or Division Manager for review and approval of the proposed disposition.

5.5.3 The NCR shall then be forwarded to the EM QAPM for review and approval to ensure that appropriate QA requirements have been included. The EM QAPM or delegate shall ensure that the information identified in Paragraph 5.5.1 has been included or considered in the disposition.

5.5.4 Upon approval, the EM QAPM or delegate, shall forward all NCRs to the personnel responsible for implementation of the dispositions. Copies shall be distributed to the EM Department Director and the cognizant EM Division Managers, as a minimum.

5.6 Implementation of Disposition Actions

Assigned personnel shall implement the dispositions by the completion date as identified in the NCR disposition.

5.6.1 When additional time is needed to complete actions, the assigned personnel shall provide written notification to the EM QAPM of the adjusted completion date with an explanation of the delay. This extension request shall be submitted on or before the scheduled due date.

5.6.2 When changes to the disposition are needed, the assigned personnel shall provide written notification to the EM QAPM.

initiator, FQA, and the supplier/contractor, as a minimum. The EM QAPM or delegate shall update the NCR Log and shall notify responsible personnel to update the NCR Status Tag accordingly.

5.7.3 If verification of the disposition and related records is acceptable, the EM QAPM or delegate shall sign and date the NCR and reference the applicable surveillance or special investigative review. Copies of closed NCRs shall be distributed to the initiator, FQA, and the EM Department Director, as a minimum. The EM QAPM or delegate shall notify responsible personnel to remove the NCR Status Tag.

5.8 Records Management

5.8.1 Controlled Documents

None.

5.8.2 Records Center Documents: Records associated with this procedure shall be submitted to the EMD records center in accordance with procedure number 3-21000-ADM, 17.01, Records Management, as identified below:

Nonconformance Report (NCR) Package:

a. Closed NCRs with supporting documents
b. Voided NCRs with supporting documents, if appropriate
c. Conditional Release Request and authorization memos
d. Completed NCR Logs

6.0 REFERENCES

6.1 Superseded Documents: None.

6.2 References Cited:

EM Department Administrative Procedure 1-10000-ADM, 15.03, Control of Nonconforming Items.

ATTACHMENT 1

NONCONFORMANCE REPORT FORM

NONCONFORMANCE REPORT

EG&G ROCKY FLATS
ENVIRONMENTAL MANAGEMENT DEPARTMENT

NCR No _____ DATE _____
QAL _____ PAGE _____ OF _____
AUTH # _____ BLDG # _____
PROJ NCR No _____ P O # _____

PROJECT _____
RESPONSIBLE ORGANIZATION _____
ITEM _____
REFERENCE _____
NONCONFORMANCE DESCRIPTION _____

ISSUED BY _____ DATE _____
Name Title Organization

WORK MANAGER/SUPERVISOR _____ DATE _____

INITIAL DISTRIBUTION
☐ DEPT MGR ☐ EM QAPM ☐ PROJ MGR ☐ CONTRACTOR ☐ H&S ☐
☐ DIV MGR ☐ QUAL COORD ☐ CONST COORD ☐ ENGR ☐ SITE QA ☐

DISPOSITION ☐ USE AS IS ☐ REPAIR ☐ REWORK ☐ REJECT ☐ AS BUILT REQUIRED

DISPOSITION APPROVALS

DIV MGR _____ DATE _____ H&S _____ DATE _____
PROJ MGR _____ DATE _____ EM QAPM _____ DATE _____
ENGR _____ DATE _____ _____ DATE _____

FINAL DISTRIBUTION
☐ DEPT MGR ☐ EM QAPM ☐ PROJ MGR. ☐ CONTRACTOR ☐ H&S ☐ EM RECORDS
☐ DIV MGR ☐ QUAL COORD ☐ CONST COORD ☐ ENGR ☐ SITE QA ☐

ATTACHMENT 2 (continued)

NCR INSTRUCTION SHEET

11. Dwg(s). - Initiator enters the drawing numbers and respective revisions which describe the feature of the item found to be nonconforming.

12. Spec./STD(S) - Initiator enters the specification or standard, including revision, which details the feature of the item found to be nonconforming.

13. NCR Type - Completed by the EM QAPM by entering an "X" in the appropriate box after the word which describes the NCR type.

14. Item - Initiator enters the description of the item for which the nonconformance has been identified.

15. Location - Initiator enters a description of the physical location within the building or area where the nonconforming item can be found.

16. Nonconformance Description - Completed by Initiator by identifying in detail a description of the specific nonconformance. Include specific paragraphs of standards or specifications, drawing details, dates, and other data which specifically outlines the requirements violated by the condition. Essentially, state what the existing condition is and what the requirement documents state the condition should be. Complete the report by section. This section will also include reference to the Resumption Indication Number (RIN) and the corresponding Work Breakdown Structure (WBS) if applicable.

17. Operability/Safety Assessment - Completed by the CEO as applicable based on the result of the Operability/Safety Assessment. This block may be N/A'd by the EM QAPM if the item has not been associated with an operating system.

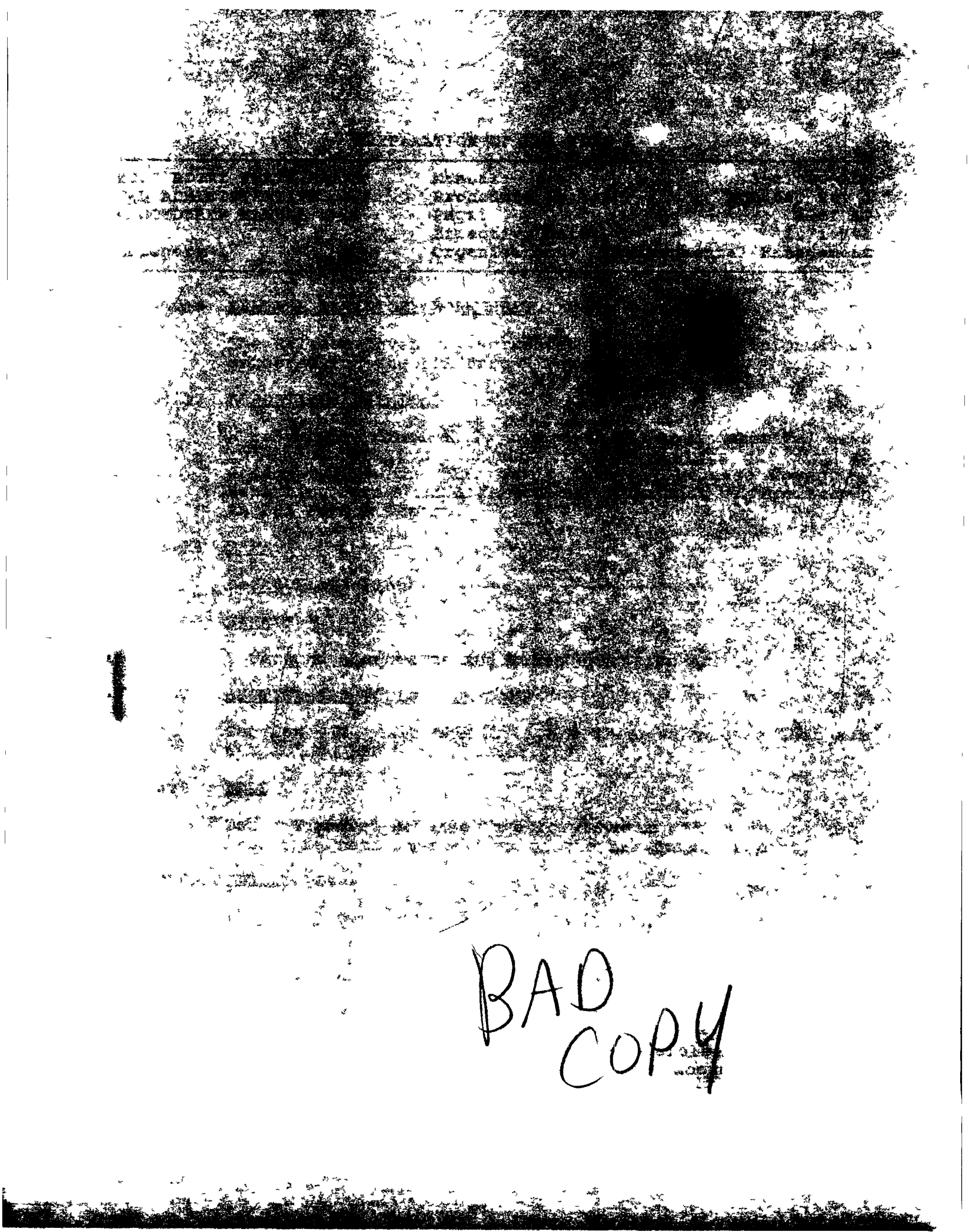
18. Operations/Functional Manager Notification - Completed by the CEO as applicable based on the result of the Operability/Safety Assessment. This block may be N/A'd by the EM QAPM if not applicable.

ATTACHMENT 3

NONCONFORMANCE REPORT LOG

ROCKY FLATS PLANT ENVIRONMENTAL RESTORATION PROGRAM
NONCONFORMANCE REPORT LOG

DATE	NUMBER EM NCR	PREPARED BY	RESPONSIBLE ORGANIZATION	DESCRIPTION	STATUS	DATE CLOSED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PREPARATION OF EPA FORM R

EG&G ROCKY FLATS PLANT	Manual:	3-21000-ADM
EMD ADMINISTRATIVE	Procedure No.:	AQD.08, Rev 1
PROCEDURES MANUAL	Page:	1 of 17
	Effective Date:	10/10/91
Category 1	Organization:	Environmental Management

This is a
CONTROLLED DOCUMENT
ENVIRONMENTAL MANAGEMENT
This is a RED Stamp

TITLE: PREPARATION OF EPA FORM R

Approved By:

Director, Environmental Management — Date: 10/10/91

1.0 PURPOSE

The purpose of this procedure is to specify a method for the Chemical Tracking and Control Systems Group of the Air Quality and Chemical Tracking Division to accurately complete the Environmental Protection Agency (EPA) Form R report (Attachment 1) required under the Superfund Amendments and Reauthorization Act Title III, Section 313, of 1986.

2.0 SCOPE

This procedure covers the retrieval of pertinent data for the EPA Form R report from existing information sources at the Rocky Flats Plant (RFP), the peer review of the material, and the final compilation of the EPA Form R report.

3.0 TERMS/DEFINITIONS

3.1 APEN

Air Pollution Emission Notice is the mechanism that allows the Colorado Department of Health to track air pollution sources, determine their environmental impact, and issue appropriate air emission permits. APENs were prepared for approximately 110 buildings on the site that have the potential for chemical emissions.

3.2 AQCTD

Air Quality and Chemical Tracking Division.

3.3 CCS

Chemical Control System is a program consisting of computerized tracking and administrative controls that oversees the planned parenthood to grave movement of

REVIEWED FOR CLASSIFICATI
By
Date 10-07-91

chemicals at RFP. The CCS is maintained by the Chemical Tracking and Control Systems group of AQCTD with support from Health and Safety, Information Resources, Waste Programs, and production managers.

3.4 CCS DATABASE

CCS database is the ORACLE computer program on the RFP unclassified VAX that consists of a container-based chemical identification and tracking module and an electronic material safety data sheet module.

3.5 CFR

Code of Federal Regulations.

3.6 CONTACT PERSON

A Rocky Flats employee who could supply pertinent information for completion of the EPA Form R report.

3.7 CTCS

Chemical Tracking and Control Systems is a group within the AQCTD of the Environmental Management Department that oversees the real-time tracking of chemicals at RFP. The group is also responsible for completing Superfund Amendments and Reauthorization Act Title III reporting for that Act's Section 312 and 313.

3.8 DOE, RFO

Department of Energy, Rocky Flats Office.

3.9 DE MINIMUS

De minimus level is 1.0 percent concentration of a mixture of chemicals, or 0.1 percent if the chemical meets the Occupational Safety and Health Administration carcinogen standard.

3.10 EPA

Environmental Protection Agency.

3.11 EPA FORM R REPORT

EPA Form R report, the Toxic Chemical Release Inventory Reporting Form, is required by Section 313 of the Emergency Planning and Community Right-to-Know Act (Title III of the Superfund Amendments and Reauthorization Act of 1986), Public Law 99-499. A completed EPA Form R report must be submitted for each toxic chemical manufactured, processed, or otherwise used at each covered facility as prescribed in the reporting rule in 40 CFR Part 372.

3.12 INVENTORY MODULE

Inventory Module is a part of the inventory menu found on the main menu of the CCS database.

3.13 MSDS

Material Safety Data Sheet.

3.14 PEER REVIEW TEAM

The peer review team is comprised of people assigned to examine and comment on the adequacy of the EPA Form R report prior to its approval.

3.14.1 Citation

The location in the text to which the comment applies.

3.14.2 Comment

The reviewer's comments.

3.14.3 Disposition

CTCS's response to the comment.

3.15 PROCESS ID

Process ID numbers have been assigned to each process that occurs at RFP by EG&G and its subcontractors. The number consists of the building number and a numerical suffix assigned to a given process within the building.

3.16 RELEASE INVENTORY WORKSHEET

The Release Inventory Worksheet documents all information gathered for the EPA Form R report.

3.17 REPORTABLE CHEMICAL

A reportable chemical is a Section 313 toxic chemical used in excess of 10,000 pounds or a de minimus quantity as designated in the "EPA Toxic Chemical Release Inventory Reporting Form R and Instructions" that must be reported on an EPA Form R report.

3.18 RFP

Rocky Flats Plant.

3.19 SARA

Superfund Amendments and Reauthorization Act.

3.20 SECTION 313 TOXIC CHEMICALS

Section 313 toxic chemicals are those chemicals that are subject to EPA Form R reporting.

3.21 TRIS

Toxic Chemical Release Inventory System (TRIS) is the EPA-issued magnetic media form of the EPA Form R report.

4.0 RESPONSIBILITIES

4.1 CTCS

The CTCS group is responsible for implementing this procedure and for preparing the Form R reports each year.

4.2 Peer Review Team

The peer review team members are responsible for verifying the contents of the Form R report with documented review comments submitted to CTCS.

5.0 PROCEDURE

NOTE

This procedure assumes the accurate and timely entry of chemical tracking information into the CCS database. If this database is not available or current, contact the CTCS Manager for direction in obtaining the required information.

5.1 Select Chemicals for EPA Form R

5.1.1 Query Inventory Module for Section 313 Toxic Chemicals in March to obtain a printout of the amounts of these materials used in the previous calendar year.

5.1.2 Add quantities of like chemicals reported as used during the previous calendar year.

5.1.3 Designate reportable chemicals based on the "EPA Toxic Chemical Release Inventory Reporting Form R and Instructions."

5.2 Crosscheck CCS Database Information

NOTE

The Inventory Module records the person who received the chemical in various locations. In addition, CTCS personnel have contacts from whom individual building referrals can be obtained.

5.2.1 Identify contact person(s) for location(s) of each chemical.

NOTE

A Release Inventory Worksheet for each reportable chemical shall contain information as specified in Section 5.2.2.

5.2.2 Verify chemical use.

5.2.2.1 Verify amount used of the reportable chemical by calling the contacts referenced in Section 5.2.1 of this document. Note the contact's name, department, telephone number, and the and the date contacted, on the inventory worksheet.

5.2.2.2 Identify the process in which the chemical is required under Section 313 requirements discussed in "EPA Toxic Chemical Release Inventory Reporting Form R and Instructions." Document the process name, location, and emission information on the Release Inventory Worksheet.

5.2.2.3 Sign and date the Release Inventory Worksheet.

5.3 Crosscheck Usage Information

5.3.1 Verify the efficiency and stack release information with the APEN reports, and document this on the analysis.

5.3.2 Equate chemical use to the Waste Stream Identification and Characterization Reports prepared for buildings by a Waste Programs contractor, and document this on the analysis.

5.3.3 If the system does not balance, contact appropriate sources to verify information (see Release Inventory Worksheet) and/or seek additional assistance from the CTCS Manager. Document resolution of any discrepancies on the analysis.

5.3.4 Sign and date the analysis.

5.4 Prepare Draft EPA Form R

NOTE
The first and second page of each EPA Form R report are to be identical for a single facility as per the Form R instructions.

5.4.1 Complete the first and second page of the EPA Form R report as directed per the "Toxic Chemical Release Inventory Reporting Form R and Instructions."

5.4.2 Use neat, readable copies as cover sheets for all the EPA Form R reports.

NOTE
Each reportable chemical has an EPA Form R report.

5.4.3 Complete pages three through five of the EPA Form R report for each reportable chemical as directed by the "Toxic Chemical Release Inventory Reporting Form R and Instructions."

5.5 CTCS Internal Review

5.5.1 Make a copy of the documents from steps 5.2.2.3, 5.3.4, and 5.4.3 and have them verified by the CTCS Manager.

5.5.2 Revise the documentation as necessary (repeating steps 5.1 to 5.4, as needed).

5.5.3 Once the documentation is verified, have the CTCS Manager sign and date the copy of this form verifying concurrence.

5.6 EPA Form R Peer Review

5.6.1 Submit Release Inventory Worksheets and draft EPA Form R reports by May 31 of each year to the Environmental and Waste Management peer review team described below:

a. Environmental Management - AQCTD, CTCS

b. Environmental Management - AQCTD, Clean Air Act
c. Waste Operations - Liquid Waste
d. Waste Operations - Permitting and Compliance
e. DOE, RFO - Waste Management and Environment Division

5.6.2 Written citations and comments per the EMD Administrative Procedures Manual's "Document Review" procedure (3-21000-ADM-05.05) should be returned to CTCS within 2 weeks.

NOTE
Steps 5.7 and 5.8 should take a total of 1 week to complete.

5.7 Incorporation of Comments

5.7.1 Resolve citations and comments generated in Section 5.6. Call contacts specified in Section 5.2.1 of this document, to support disposition as necessary.

5.7.2 Document contact's reply and resolution on the document review sheets per 3-21000-ADM-05.05.

5.8 Final EPA Form R Reports

NOTE
EPA requests that the Form R report be submitted to them on magnetic media. The State of Colorado requests submittals in hard copy form.

5.8.1 Revise documentation as necessary. Repeat applicable portions of Section 5.4 to 5.7 of this procedure making the corrections indicated in Section 5.7 of this procedure.

5.8.2 Prepare an EPA Form R. This may be done using the TRIS Report software. Guidance for using this software is contained in Attachment 3.

5.8.3 Make a copy of the EPA Form R and have it verified against the input data by the CTCS Manager.

5.8.4 Revise the EPA Form R as necessary (repeating steps 5.8.2 to 5.8.3, as needed). The CTCS Manager shall resolve any disputes.

5.8.5 Once the EPA Form R is verified, have the CTCS Manager sign and date a copy of this form verifying concurrence.

5.8.6 Prepare a transmittal draft memo per the direction of the CTCS.

5.8.7 Prepare a history package for this EPA Form R containing the documentation referenced in steps 5.5.5, 5.7.2, and 5.8.5 and then submit this history package to the CTCS Manager for transmission to the EMD records center, per 3-21000-ADM-17.01, Records Management.

5.8.8 Submit the draft memo and EPA Form R to the CTCS Manager for transmittal.

5.9 EPA Form R Submittal to DOE, RFO

Submit EPA Form R reports to DOE, RFO no later than June 17 of the current year. Form R reports are due to the EPA and the Colorado Department of Health by July 1 of each year.

6.0 REFERENCES

6.1 Toxic Chemical Release Inventory Reporting Form R and Instructions, EPA 560, United States Environmental Protection Agency, Washington D. C.

6.2 Toxic Chemical Release Inventory Disk and Instructions, United States Environmental Protection Agency, Washington D. C.

6.3 EMD Administrative Procedures Manual, 3-21000-ADM-05.05, "Document Review," Rocky Flats Plant, Golden, Colorado.

6.4 EMD Administrative Procedures Manual, 3-21000-ADM-17.01, "Records Management," Rocky Flats Plant, Golden, Colorado.

7.0 ATTACHMENTS

1. EPA Form R report
2. Sample Release Inventory Worksheet
3. Guidance for Preparation of the TRIS Report

ATTACHMENT 1
EPA Form R Report

Approval Expires _____

EPA U S Environmental Protection Agency

TOXIC CHEMICAL RELEASE INVENTORY REPORTING FORM

Section 313 of the Emergency Planning and Community Right-to-Know Act of 1986 also known as Title III of the Superfund Amendments and Reauthorization Act

EPA FORM **R**

PART I FACILITY IDENTIFICATION INFORMATION

(This space for your optional use.)

1 | 1.1 Are you claiming the chemical identity on page 3 trade secret? [ ] Yes (Answer question 1.2 and complete a second certification.) [ ] No (Do not answer 1.2. Go to question 1.3.) | 1.2 If Yes in 1.1 is this copy [ ] Sanitized [ ] Unsanitized | 1.3 Reporting Year 19__

2 CERTIFICATION (Read and sign after completing all sections.)

I hereby certify that I have reviewed the attached documents and that, to the best of my knowledge and belief, the submitted information is true and complete and that the amounts and values in this report are accurate based on reasonable estimates using data available to the preparers of this report.

Name and official title of owner/operator or senior management official

Signature | Date signed

3 FACILITY IDENTIFICATION

3.1 Facility or Establishment Name; Street Address; City; County; State; Zip Code; TRI Facility Identification Number

WHERE TO SEND COMPLETED FORMS

1 EPCRA REPORTING CENTER
P O BOX 23779
WASHINGTON DC 20026-3779
ATTN TOXIC CHEMICAL RELEASE INVENTORY

2 APPROPRIATE STATE OFFICE (See instructions in Appendix G)

3.2 This report contains information for (Check only one) a [ ] An entire facility b [ ] Part of a facility

3.3 Technical Contact; Telephone Number (Include area code)

3.4 Public Contact; Telephone Number (Include area code)

3.5 SIC Code (4 digit) a b c d e - f

3.6 Latitude: Degrees, Minutes, Seconds; Longitude: Degrees, Minutes, Seconds

3.7 Dun & Bradstreet Number(s) a b

3.8 EPA Identification Number(s) (RCRA I.D. No.) a b

3.9 NPDES Permit Number(s) a b

3.10 Receiving Streams or Water Bodies (enter one name per box) a b c d e f

3.11 Underground Injection Well Code (UIC) Identification Number(s) a b

4 PARENT COMPANY INFORMATION

4.1 Name of Parent Company | 4.2 Parent Company's Dun & Bradstreet Number

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ATTACHMENT 1 (Continued)
EPA Form R Report

(Important: Type or print - read instructions before completing form.)

Page 2 of 5

EPA EPA FORM R
PART II OFF-SITE LOCATIONS TO WHICH TOXIC CHEMICALS ARE TRANSFERRED IN WASTES

(This space for your optional use.)

1 PUBLICLY OWNED TREATMENT WORKS (POTWs)

1.1 POTW name		1.2 POTW name	
Street Address		Street Address	
City	County	City	County
State	Zip	State	Zip

2 OTHER OFF-SITE LOCATIONS (DO NOT REPORT LOCATIONS TO WHICH WASTES ARE SENT ONLY FOR RECYCLING OR REUSE)

2.1 Off-site location name		2.2 Off-site location name	
EPA identification number (RCRA ID No.)		EPA identification number (RCRA ID No.)	
Street Address		Street Address	
City	County	City	County
State	Zip	State	Zip
Is location under control of reporting facility or parent company?	[ ] Yes [ ] No	Is location under control of reporting facility or parent company?	[ ] Yes [ ] No

2.3 Off-site location name		2.4 Off-site location name	
EPA identification number (RCRA ID No.)		EPA identification number (RCRA ID No.)	
Street Address		Street Address	
City	County	City	County
State	Zip	State	Zip
Is location under control of reporting facility or parent company?	[ ] Yes [ ] No	Is location under control of reporting facility or parent company?	[ ] Yes [ ] No
2.5 Off-site location name		2.6 Off-site location name	
EPA identification number (RCRA ID No.)		EPA identification number (RCRA ID No.)	
Street Address		Street Address	
City	County	City	County
State	Zip	State	Zip
Is location under control of reporting facility or parent company?	[ ] Yes [ ] No	Is location under control of reporting facility or parent company?	[ ] Yes [ ] No

[ ] Check if additional pages of Part II are attached. How many? _____

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ATTACHMENT 1 (Continued)
EPA Form R Report

(Important: Type or print; read instructions before completing form.)

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EPA EPA FORM R
PART III CHEMICAL-SPECIFIC INFORMATION

(This space for your optional use.)

1 CHEMICAL IDENTITY (Do not complete this section if you complete Section 2.)

1.1 [Reserved]

1.2 CAS Number (Enter only one number exactly as it appears on the 313 list. Enter NA if reporting a chemical category.)

1.3 Chemical or Chemical Category Name (Enter only one name exactly as it appears on the 313 list.)

1.4 Generic Chemical Name (Complete only if Part I, Section 1.1 is checked Yes. Generic name must be structurally descriptive.)

2 MIXTURE COMPONENT IDENTITY (Do not complete this section if you complete Section 1.)

Generic Chemical Name Provided by Supplier (Limit the name to a maximum of 70 characters (e.g., numbers, letters, spaces, punctuation).)

3 ACTIVITIES AND USES OF THE CHEMICAL AT THE FACILITY (Check all that apply.)

3.1 Manufacture the chemical: a [ ] Produce; b [ ] Import. If produce or import: c [ ] For on-site use/processing; d [ ] For sale/distribution; e [ ] As a byproduct; f [ ] As an impurity.

3.2 Process the chemical: a [ ] As a reactant; b [ ] As a formulation component; c [ ] As an article component; d [ ] Repackaging only.

3.3 Otherwise use the chemical: a [ ] As a chemical processing aid; b [ ] As a manufacturing aid; c [ ] Ancillary or other use.

4 MAXIMUM AMOUNT OF THE CHEMICAL ON-SITE AT ANY TIME DURING THE CALENDAR YEAR

[ ][ ] (enter code)

5. RELEASES OF THE CHEMICAL TO THE ENVIRONMENT ON-SITE

You may report releases of less than 1,000 pounds by checking ranges under A.1 (Do not use both A.1 and A.2)		A. Total Release (pounds/year): A.1 Reporting Range (1–10 / 11–499 / 500–999)	A.2 Enter Estimate	B. Basis of Estimate (enter code)	C. % From Stormwater
5.1 Fugitive or non-point air emissions	5.1a	[ ][ ][ ]		5.1b [ ]	
5.2 Stack or point air emissions	5.2a	[ ][ ][ ]		5.2b [ ]	
5.3 Discharges to receiving streams or water bodies (Enter letter code from Part I, Section 3.10 for stream(s) in the box provided.) 5.3.1 [ ]	5.3.1a	[ ][ ][ ]		5.3.1b [ ]	5.3.1c %
5.3.2 [ ]	5.3.2a	[ ][ ][ ]		5.3.2b [ ]	5.3.2c %
5.3.3 [ ]	5.3.3a	[ ][ ][ ]		5.3.3b [ ]	5.3.3c %
5.4 Underground injection	5.4a	[ ][ ][ ]		5.4b [ ]	
5.5 Releases to land					
5.5.1 On-site landfill	5.5.1a	[ ][ ][ ]		5.5.1b [ ]	
5.5.2 Land treatment/application farming	5.5.2a	[ ][ ][ ]		5.5.2b [ ]	
5.5.3 Surface impoundment	5.5.3a	[ ][ ][ ]		5.5.3b [ ]	
5.5.4 Other disposal	5.5.4a	[ ][ ][ ]		5.5.4b [ ]	

[ ] (Check if additional information is provided on Part IV—Supplemental Information.)

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ATTACHMENT 1 (Continued)
EPA Form R Report

(Important: Type or print; read instructions before completing form.)

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EPA — EPA FORM R
PART III: CHEMICAL-SPECIFIC INFORMATION (continued)

(This space for your optional use.)

6. TRANSFERS OF THE CHEMICAL IN WASTE TO OFF-SITE LOCATIONS

You may report transfers of less than 1,000 pounds by checking ranges under A 1. (Do not use both A 1 and A 2)	A Total Transfers (pounds/yr): A 1 Reporting Ranges (1–10, 11–499, 500–999)	A 2 Enter Estimate	B Basis of Estimate (enter code)	C Type of Treatment/ Disposal (enter code)
6 1 1 Discharges to POTW (enter location number from Part II, Section 1.) 1	[ ] [ ] [ ]		6 1 1b	
6 2 1 Other off-site location (enter location number from Part II, Section 2.) 2	[ ] [ ] [ ]		6 2 1b	6 2 1c M
6 2 2 Other off-site location (enter location number from Part II, Section 2.) 2	[ ] [ ] [ ]		6 2 2b	6 2 2c M
6 2 3 Other off-site location (enter location number from Part II, Section 2.) 2	[ ] [ ] [ ]		6 2 3b	6 2 3c M

[ ] (Check if additional information is provided on Part IV-Supplemental Information.)

7. WASTE TREATMENT METHODS AND EFFICIENCY

☐ Not Applicable or (NA) – Check if no on-site treatment is applied to any waste stream containing the chemical or chemical category

A General Wastestream (enter code)	B Treatment Method (enter code)	C Range of Influent Concentration (enter code)	D Sequential Treatment? (check if applicable)	E Treatment Efficiency Estimate	F Based on Operating Data? Yes / No
7 1a ☐	7 1b ☐☐☐	7 1c ☐	7 1d [ ]	7 1e %	7 1f [ ] [ ]
7 2a ☐	7 2b ☐☐☐	7 2c ☐	7 2d [ ]	7 2e %	7 2f [ ] [ ]
7 3a ☐	7 3b ☐☐☐	7 3c ☐	7 3d [ ]	7 3e %	7 3f [ ] [ ]
7 4a ☐	7 4b ☐☐☐	7 4c ☐	7 4d [ ]	7 4e %	7 4f [ ] [ ]
7 5a ☐	7 5b ☐☐☐	7 5c ☐	7 5d [ ]	7 5e %	7 5f [ ] [ ]
7 6a ☐	7 6b ☐☐☐	7 6c ☐	7 6d [ ]	7 6e %	7 6f [ ] [ ]
7 7a ☐	7 7b ☐☐☐	7 7c ☐	7 7d [ ]	7 7e %	7 7f [ ] [ ]
7 8a ☐	7 8b ☐☐☐	7 8c ☐	7 8d [ ]	7 8e %	7 8f [ ] [ ]
7 9a ☐	7 9b ☐☐☐	7 9c ☐	7 9d [ ]	7 9e %	7 9f [ ] [ ]
7 10a ☐	7 10b ☐☐☐	7 10c ☐	7 10d [ ]	7 10e %	7 10f [ ] [ ]

[ ] (Check if additional information is provided on Part IV-Supplemental Information.)

8. POLLUTION PREVENTION: OPTIONAL INFORMATION ON WASTE MINIMIZATION
(Indicate actions taken to reduce the amount of the chemical being released from the facility. See the instructions for added items and an explanation of what information to include.)

A Type of Modification (enter code)	B Quantity of the Chemical in Wastes Prior to Treatment or Disposal: Current reporting year (pounds/year)	Prior year (pounds/year)	Or percent change (Check (+) or (–))	C Index	D Reason for Action (enter code)
M ☐	_____	_____	☐ + ☐ – _____ %	☐,☐	R ☐

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ATTACHMENT 1 (Continued)
EPA Form R Report

(Important: Type or print; read instructions before completing form.) Page 5 of 5

EPA | EPA FORM R | (This space for your optional use.)

PART IV SUPPLEMENTAL INFORMATION

Use this section if you need additional space for answers to questions in Part III. Number the lines used sequentially from lines in prior sections (e.g. 5.3.4, 6.1.2, 7.11)

ADDITIONAL INFORMATION ON RELEASES OF THE CHEMICAL TO THE ENVIRONMENT ON-SITE (Part III Section 5.3)

You may report releases of less than 1,000 pounds by checking ranges under A.1. (Do not use both A.1 and A.2)		A. Total Release (pounds/yr) A.1 Reporting Ranges 1-10 / 11-499 / 500-999	A.2 Enter Estimate	B. Basis of Estimate (enter code in box provided)	C. % From Stormwater
5.3 Discharges to receiving streams or water bodies 5.3 ___ [ ]	5.3 ___a	[ ] [ ] [ ]		5.3 ___b [ ]	5.3 ___c %
(Enter letter code from Part I Section 3.10 for stream(s) in the box provided.) 5.3 ___ [ ]	5.3 ___a	[ ] [ ] [ ]		5.3 ___b [ ]	5.3 ___c %
5.3 ___ [ ]	5.3 ___a	[ ] [ ] [ ]		5.3 ___b [ ]	5.3 ___c %

ADDITIONAL INFORMATION ON TRANSFERS OF THE CHEMICAL IN WASTE TO OFF-SITE LOCATIONS (Part III Section 6)

You may report transfers of less than 1,000 pounds by checking ranges under A.1. (Do not use both A.1 and A.2)	A. Total Transfers (pounds/yr) A.1 Reporting Ranges 1-10 / 11-499 / 500-999	A.2 Enter Estimate	B. Basis of Estimate (enter code in box provided)	C. Type of Treatment/ Disposal (enter code in box provided)
6.1 ___ Discharge to POTW (enter location number from Part II, Section 1.) [1] [ ]	[ ] [ ] [ ]		6.1 ___b [ ]	
6.2 ___ Other off-site location (enter location number from Part II, Section 2.) [2] [ ]	[ ] [ ] [ ]		6.2 ___b [ ]	6.2 ___c [M][ ][ ]
6.2 ___ Other off-site location (enter location number from Part II, Section 2.) [2] [ ]	[ ] [ ] [ ]		6.2 ___b [ ]	6.2 ___c [M][ ][ ]
6.2 ___ Other off-site location (enter location number from Part II, Section 2.) [2] [ ]	[ ] [ ] [ ]		6.2 ___b [ ]	6.2 ___c [M][ ][ ]

ADDITIONAL INFORMATION ON WASTE TREATMENT METHODS AND EFFICIENCY (Part III, Section 7)

A. General Wastestream (enter code in box provided)	B. Treatment Method (enter code in box provided)	C. Range of Influent Concentration (enter code)	D. Sequential Treatment? (check if applicable)	E. Treatment Efficiency Estimate	F. Based on Operating Data? Yes No
7 ___a [ ]	7 ___b [ ][ ][ ]	7 ___c [ ]	7 ___d [ ]	7 ___e %	7 ___f [ ] [ ]
7 ___a [ ]	7 ___b [ ][ ][ ]	7 ___c [ ]	7 ___d [ ]	7 ___e %	7 ___f [ ] [ ]
7 ___a [ ]	7 ___b [ ][ ][ ]	7 ___c [ ]	7 ___d [ ]	7 ___e %	7 ___f [ ] [ ]
7 ___a [ ]	7 ___b [ ][ ][ ]	7 ___c [ ]	7 ___d [ ]	7 ___e %	7 ___f [ ] [ ]
7 ___a [ ]	7 ___b [ ][ ][ ]	7 ___c [ ]	7 ___d [ ]	7 ___e %	7 ___f [ ] [ ]
7 ___a [ ]	7 ___b [ ][ ][ ]	7 ___c [ ]	7 ___d [ ]	7 ___e %	7 ___f [ ] [ ]
7 ___a [ ]	7 ___b [ ][ ][ ]	7 ___c [ ]	7 ___d [ ]	7 ___e %	7 ___f [ ] [ ]
7 ___a [ ]	7 ___b [ ][ ][ ]	7 ___c [ ]	7 ___d [ ]	7 ___e %	7 ___f [ ] [ ]
7 ___a [ ]	7 ___b [ ][ ][ ]	7 ___c [ ]	7 ___d [ ]	7 ___e %	7 ___f [ ] [ ]

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ATTACHMENT 2
Sample Release Inventory Worksheet

EPA FORM R RELEASE INVENTORY WORKSHEET

CHEMICAL _____ COMMENTS

Process ID/Names _____
Total Usage Quantity _____
Process Locations _____
Process emission information
_____

Contact person's

	name	department	phone #	date
1				
2				
3				
4				
5				
6				
7				
8				
9				
10				
11				

*Number comments with the contact person's number

ATTACHMENT 3
Guidance For Preparation of the TRIS Report

1. Load the TRIS Report onto the CTCS's IBM or compatible computer.

2. Configure TRIS Report to conform with the computer being used.

3. Enter the EPA Form R report information documented in Section 5.7.1 of this procedure per the directions accompanying the TRIS diskette.

4. Generate the EPA Form R reports.

5. Print EPA Form R reports.

6. Compare printed TRIS report with the report generated from Section 5.8.1 of this procedure and make necessary corrections.

7. Copy the necessary files from the TRIS Report to a diskette.

8. Label the magnetic diskette as per the directions accompanying the TRIS diskette.

9. Generate a certification cover letter to be signed by the official listed in Section 2 of Part I of the EPA Form R reports as per the directions accompanying the TRIS diskette.